bp

BP Products North America Inc.
2815 Indianapolis Blvd.
P.O. Box 710
Whiting, IN 46394-0710
USA

March 6, 2013

**CERTIFIED MAIL#**
**RETURN RECEIPT REQUESTED**

Jamie Paulin
Compliance Section 1
RCRA Branch
USEPA Region V
Land and Chemicals Division
77 West Jackson Boulevard, LR 8J
Chicago, IL 60604

**Re: BP Response to EPA Request for Information Section 3007 of RCRA, letter Dated January 31, 2013**

Dear Ms. Paulin,

Please find enclosed BP Products North America, Inc. Whiting Business Unit (WBU) response to EPA's request for information letter dated January 31, 2013. Please be aware that there are some points of clarification on the inspection report dated 8/18/2011. These points of clarification are attached in the Response Document under paragraph number 4. If you should require any further clarification or information regarding this request please contact Ms. Rose Herrera, Environmental Team Leader at 219-473-3393 or email herrerrm@bp.com.

I certify under the penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of information and documents. Based on my review of all relevant information and documents, and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true,

accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Sincerely,

Nick Spencer /rka 06MAR13

Nick Spencer
Business Unit Leader
Whiting Business Unit

Attachments: BP Response Document March 2013

cc: Nancy Johnston, Indiana Department of Environmental Management (IDEM)
Walt Francis, Acting Chief Compliance Section 1 RCRA Branch
USEPA, Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

# BP Response Document

1. Identify all persons consulted in preparing the answers to this Request for Information.

Mr. Frank A. Camilli, BP Environmental Specialist
Ms. Rosalie M. Herrera, BP Environmental Team Leader
Mr. Ryan O'Larey, BP Lakefront Process Engineer
Mr. Timothy J. Weisenberger, BP Environmental Compliance Advocacy
Mr. John Wigger, BP Environmental Compliance Advocacy
Ms. Linda J. Wilson, BP Environmental Manager

2. Provide the full name, title, address and telephone number for each person identified in response to request number 1 above.

Mr. Frank Camilli, BP Environmental Specialist
BP Products, NA
MC122 RSB 238
2815 Indianapolis Blvd
Whiting, Indiana 46394
219-473-3321

Ms. Rose Herrera, BP Environmental Team Leader
BP Products, NA
MC122 RSB 204
2815 Indianapolis Blvd
Whiting, Indiana 46394
219-473-3393

Mr. Ryan O'Larey, BP Lakefront Process Engineer
BP Products, NA
MC122 RSB 315A
2815 Indianapolis Blvd
Whiting, Indiana 46394
219-473-1180

Mr. Tim Weisenberger, BP Environmental Consultant
Environmental Advisor - Water
110 Durham Drive
Madison, Alabama
256- 466- 5731

Mr. John Wigger, BP Environmental Consultant
BP Environmental Compliance and Advocacy
BP Products, NA
600-1WA 1020C
150 W. Warrenville, RD
Naperville, IL 60563
630- 420-5257

Ms. Linda Wilson, BP Environmental Manager
BP Products, NA
MC122 RSB 315A
2815 Indianapolis Blvd
Whiting, Indiana 46394
219-473-3287

3. Provide the full name or names of the current owner or owners of the BP Whiting facility.

BP Products North America Inc.
4101 Winfield Road
Warrenville, IL 60555
630-836-5000

4. EPA inspected the BP Whiting facility on August 18, 2011, and was accompanied by the Indiana Department of Environmental Management (IDEM). A copy of the inspection report and photograph log have been enclosed for your reference.

Please note that there are some statements in the inspection report that need correction or clarification. See attached note regarding listed corrections needed

a. Please describe the process of generation of oil-bearing secondary materials, F037 and F038, if applicable, starting from the gravitational separation of the oil/water/solids. Please provide a flow diagram, if available.

> Please include all sources that contribute to the sludge, such as those generated in separators; tanks and impoundments; ditches and other conveyances; sumps; and stormwater units receiving dry weather flow. In addition, include all residuals generated from processing or recycling oil-bearing hazardous secondary materials excluded under 329 IAC § 3.1-6-1 and § 3.1-6-2 [40 CFR § 261.4(a)(12)(i)], if those residuals are to be disposed of.

A flow diagram (Figure 1) of the WWTP from our NPDES permit is attached which shows the processing of oil-bearing hazardous secondary materials. The Lakefront

WWTP has installed a centrifuge system (Figure 2) to process the sludges generated from the WWTP tanks and equipment such as the API separator and Dissolved Air Floatation (DAF) units which is oil-bearing hazardous secondary material. The recovered oil that has been reclaimed from the oil-bearing secondary materials is ultimately re-injected into the pipe-still crude distillation operations. The solids (or residuals) are disposed of as hazardous waste, and the wastewater is sent through our NPDES permitted WWTP and discharged in accordance with our NPDES permitted outfall.

The WWTP Tank 562, as well as possible direct feed from the process collection sump, feeds material to the two phase centrifuge operation to remove the solids and recycle the oil-bearing hazardous secondary material (oily water). The oily water or secondary hazardous material is sent back to the API separators for oil and water separation. The recovered oil is then pumped back into the refinery recovered oil system where it is then blended with raw crude oil for processing in the refinery crude distillation towers.

b. Please describe what happens to the oil-bearing secondary materials, once generated. Provide a flow diagram, if possible.

See 4a. above for a description of what happens to the oil-bearing secondary materials.. Figures 1 and 2 provide a flow diagram of the process.

i. Are any of the oil-bearing secondary materials stored on-site as hazardous waste and then manifested off-site as hazardous waste? If so, please include volumes of materials shipped off-site per month.

The residual solids from the Lakefront centrifuge operations are accumulated in roll-off containers prior to being shipped to a permitted hazardous waste Treatment Storage and Disposal Facility (TSDF). The volumes shipped off site per month are shown below in Table 1.

ii. Are the oil-bearing secondary materials returned to the refinery process? If so, how?

a) Are the materials reclaimed first, prior to re-insertion?
b) Are there any residuals not returned to the refinery process, if reclamation occurs prior to re-insertion? If so, what happens to those residuals?
c) If the materials are reclaimed first prior to re-insertion, please explain how they are reclaimed.

See answer to question 4a above for the description of how the oil-bearing secondary materials are returned to the refinery process.

a. Yes, see 4a. above. The processing of the sludges and ultimate recovery of the oil from the WWTP meets the description of reclamation given in 40 CFR 261.1(c)(4).The recovered oil is being re inserted back to the refinery process via our recovered oil system where recovered oil from all the refinery is blended with raw crude for insertion into the crude distillation towers. However, these materials fall under the exclusion of solid waste in 261.4(a)(12)(i) as an oil-bearing hazardous secondary material.
b. The oil-bearing secondary materials are "reclaimed" and returned to the refinery process via recovered oil system where the material is blended with raw crude into the crude distillation towers. Any residuals not returned to the refinery process (i.e. centrifuge solids) are sent off site as hazardous waste to TSDFs.
c. See 4a. above. The recovered oil is removed and separated from the wastewater and sludges by the WWTP process and API separators.

iii. Are any of the oil-bearing secondary materials sent to another petroleum refinery?

a) If so, are they sent directly to another petroleum refinery or sent to an intermediate non-refinery facility for processing prior to being sent to another petroleum refinery?

No. We do not send any oil-bearing secondary materials to another petroleum refinery.

iv. Please provide us with a flow diagram of the waste water treatment unit (WWTU).

a) Are the oil-bearing secondary materials ever placed into the WWTU?
b) Are the oil-bearing secondary materials placed into the WWTU prior to re-inserting into the refinery process?
c) Is the water collected from the oil/water/solids separator inserted into the WWTU? If so, what happens to the oil that is collected from the oil/water/solids separator? Please describe the complete cycle of oil-bearing secondary materials, including F037 and F038, if applicable, and if not described above.

WWTP flow diagram is attached see Figure 1.

a. Yes, oil-bearing secondary material is placed in the WWTU. Influents to the WWTP are described in the NPDES permit and include process waste water from the refinery, tank dewatering, maintenance activities, remediation activities, and internal WWTP activities. Please note that all refinery waste water is sent to the internal process sewer where it is sent to the refinery WWTP for oil recovery and water treatment. This material may be considered as oil-bearing secondary material.
b. Yes, as described above, oil enters the WWTP from various sources. Oil is separated from the wastewater and from wastewater treatment operations where the final recovered oil is then sent to the recovered oil system for blending and reinsertion into the refinery crude distillation towers. The solids (or residuals) are sent offsite as hazardous waste, the solids are not reinserted.
c. Yes, see 4a. above. The water from the API separators continues to be processed through the WWTP. The oil collected from the API separators is used in the refinery process via recovered oil system for blending with raw crude into the crude distillation towers.

# WWTP Flow Diagram

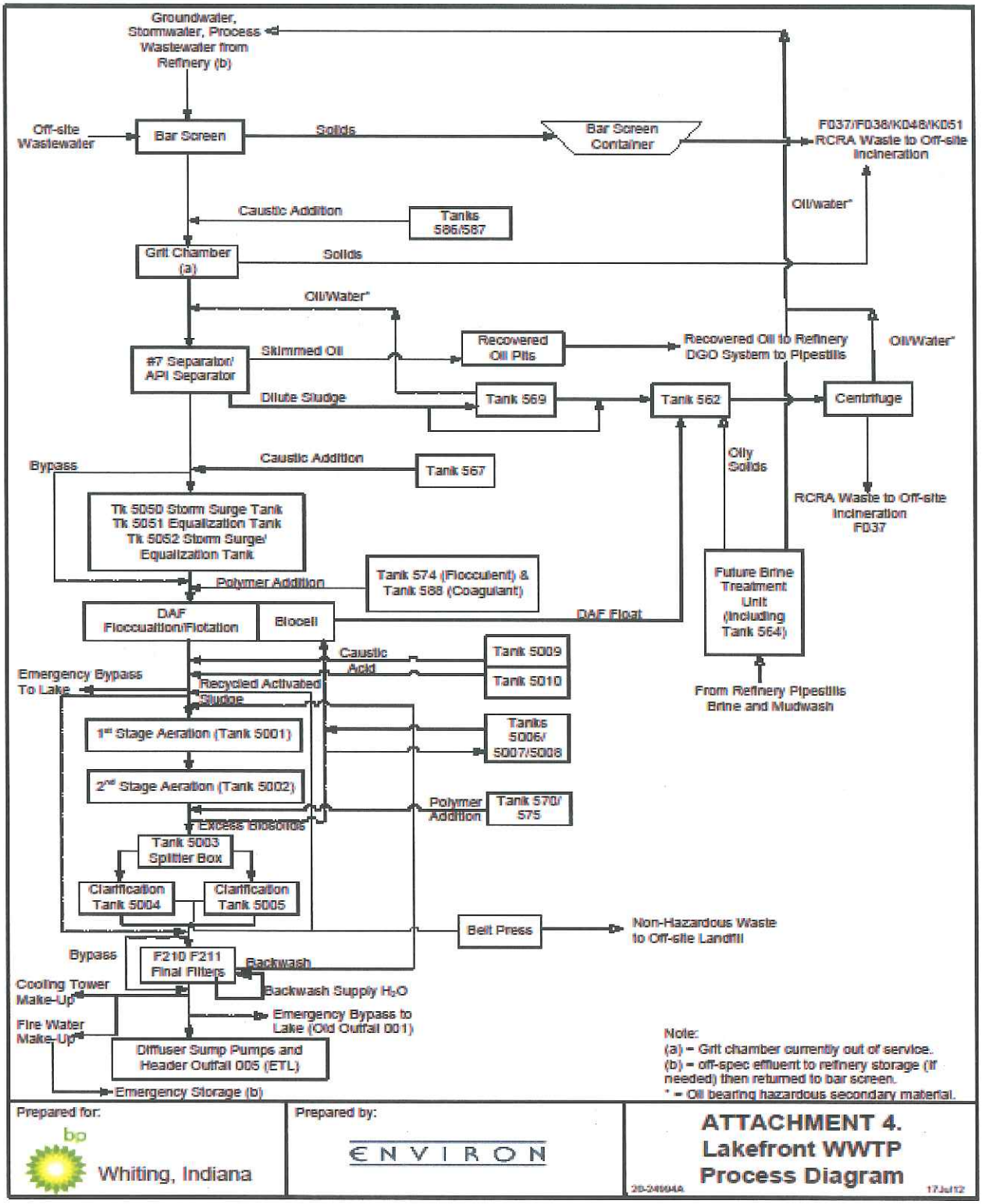


Figure 1

# Centrifuge Operation Diagram

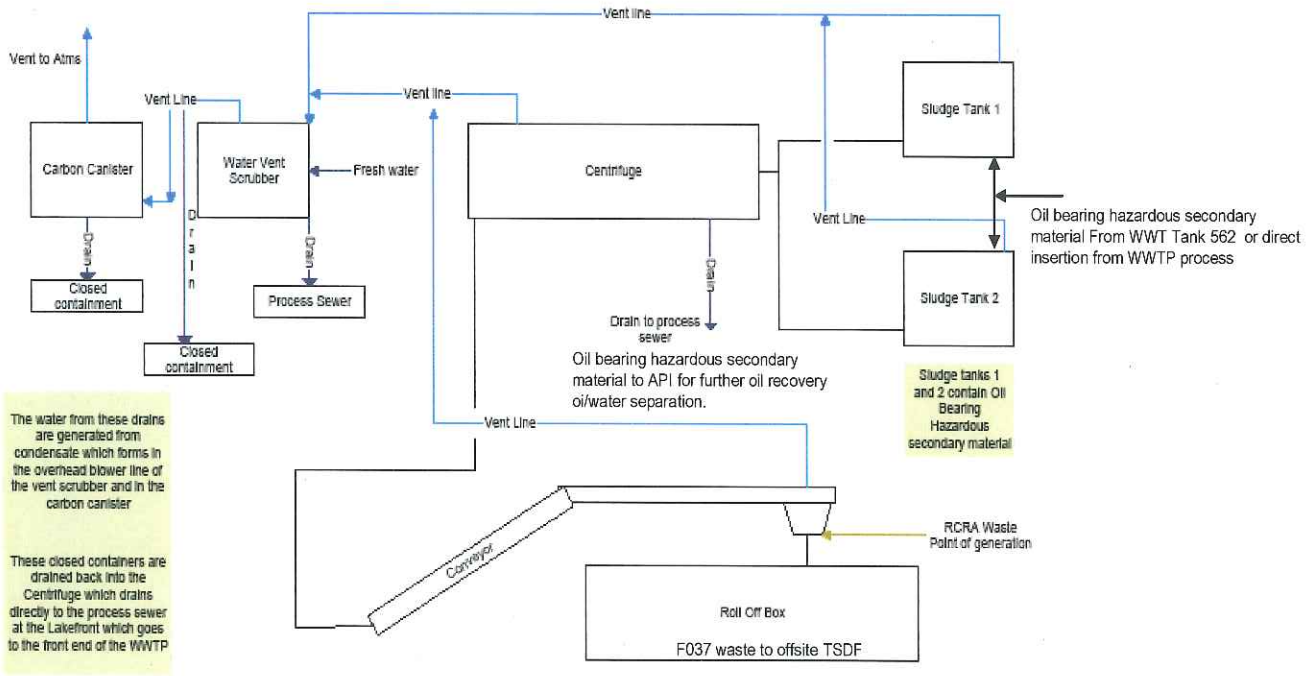


Figure 2

# Waste Shipments from WWTP 2010-2012

| Lakefront Centrifuge Solids Generation (tons)* 2010 through 2012 | | | |
|---|---|---|---|
| **Month**** | **2010** | **2011** | **2012** |
| January | 750 | 334 | 691 |
| February | 469 | 270 | 551 |
| March | 599 | 626 | 828 |
| April | 659 | 403 | 716 |
| May | 327 | 556 | 617 |
| June | 201 | 563 | 912 |
| July | 317 | 467 | 601 |
| August | 703 | 442 | 737 |
| September | 656 | 595 | 711 |
| October | 412 | 411 | 826 |
| November | 308 | 635 | 624 |
| December | 263 | 844 | 457 |

*** Also includes bar screen solids, oil pit screen solids and miscellaneous hazardous waste solids generated in EPA ID # IND000810861 meeting Lakefront centrifuge solids profile (F037, F038, K048, K051, D008)**

**** Monthly weights based on container "accumulation start date"**

**Table 1**

BP Response Document March 2013
BP Products North America Inc. - Whiting Business Unit
EPA Request for Information letter January 31, 2013
March 6, 2013

## EPA Compliance Evaluation Inspection Report
## August 18, 2011 Noted Corrections

The following listed factual corrections should be noted when reviewing the Compliance Evaluation Inspection Report dated August 18, 2011 and signed 6/29/12.

1. The date the RCRA permit expired was October 12, 2011, not April 18, 2017. We are no longer a RCRA permitted facility.
2. We do not store hazardous waste in tanks nor did we store hazardous waste in tanks during the inspection. We use drums and containers.
3. A point of clarification is that we did not completely cover the SWSB with blacktop. Only a small section of the SWSB was covered with blacktop to be used as a lay down area for equipment which IDEM had given prior approval for.
4. The hazardous waste storage building was closed in October 2011. On October 26, 2011 IDEM certified the closure of the building and acknowledged that the RCRA permit is no longer needed.
5. During the site inspection it was noted that there seemed to be two uncapped and cut wells at the south east corner of the surge basin, however it was later noted during the inspection that these were in fact old electrical conduit lines and not monitoring wells.
6. Note that photos 22, 23, and 24, are not "outside containment area for debris", but are the centrifuge operation mix and feed tanks.